

KEVIN G. HORBATIUK (KGH-4977)
RUSSO, KEANE & TONER, LLP
Attorneys for Defendant
CUNNINGHAM DUCT WORK s/h/i/a
CUNNINGHAM DUCT CLEANING CO., INC.,
26 Broadway - 28th Floor
New York, New York 10004
(212) 482-0001

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
IN RE COMBINED WORLD TRADE CENTER
AND LOWER MANHATTAN DISASTER SITE
LITIGATION
-----X

21 MC 102 (AKH)

GLADYS AGUDELO,

DOCKET NO:
07 CV 4446

Plaintiffs,

-against-

100 CHURCH, LLC, AIG REALTY, INC., ALAN
KASMAN DBA KASCO., AMBIENT GROUP, INC.,
AMERICAN INTERNATIONAL GROUP, INC.,
AMERICAN INTERNATIONAL REALTY CORP.,
ANN TAYLOR STORES CORPORATION, BANKERS
TRUST COMPANY, BATTERY PARK CITY AUTHORITY,
BLACKMON-MOORING-STEAMATIC CATASTOPHE, NOTICE OF
INC., D/B/A BMS CAT BROOKFIELD FINANCIAL ADOPTION OF
PROPERTIES, INC., BROOKFIELD FINANCIAL OF ANSWER TO
PARTNERS, L.P., BROOKFIELD PARTNERS, L.P., MASTER COMPLAINT
BROOKFIELD PROPERTIES CORPORATION,
BROOKFIELD PROPERTIES HOLDINGS INC.,
CUNNINGHAM DUCT CLEANING CO., DEUTSCHE
BANK TRUST COMPANY, DEUTSCHE BANK
TRUST COMPANY, DEUTSCHE BANK TRUST
COMPANY, DEUTSCHE BANK TRUST CORPORATION,
ENVIRONTECH CLEAN AIR, INC., GPS ENVIRONMENTAL
CONSULTANTS, INC., HILLMAN ENVIRONMENTAL
GROUP, LLC., INDOOR AIR PROFESSIONALS, INC.,
INDOOR ENVIRONMENTAL TECHNOLOGY, INC.,
JACK RESNICK & SONS, INC., KASCO
RESTORATION SERVICES CO., KENYON &
KENYON, LAW ENGINEERING, P.C., LOGANY
LLC., MERRILL LYNCH & CO., INC., NEW YORK

UNIVERSITY, NOMURA HOLDING AMERICA, INC., NOMURA SECURITIES INTERNATIONAL, INC., ONE BROADWAY, LLC RESNICK 75 PARK PLACE, LLC. ROYAL AND SUNALLIANCE INSURANCE GROUP, PLC, STRUCTURE ONE (UK), INC., STRUCTURE TONE GLOBAL SERVICES, INC., THAMES REALTY CO., THE BANK OF NEW YORK TRUST COMPANY, N.A., TISHMAN INTERIORS CORPORATION, TOSCORP., INC., TRC ENGINEERS, INC., TULLY CONSTRUCTION CO., INC., TULLY INDUSTRIES, INC., US GOVERNMENT, VERIZON NEW YORK, INC., WESTON SOLUTIONS, INC., WFP TOWER B CO., G.P., CORP., WFP TOWER B HOLDING CO., L.P., WFP TOWER B CO., L.P., WFPTOER D CO., G.P., CORP., WFP TOWER D HOLDING CO., I L.P., WFP TOWER D HOLDING CO. II LP., WFP TOWER D HOLDING I G.P., CORP., WFP TOWER D CO., L.P., AND ZAR REALTY MANAGEMENT CORP., ET AL.

Defendants.

.....X

PLEASE TAKE NOTICE, that defendant CUNNINGHAM DUCT WORK s/h/i/a CUNNINGHAM DUCT CLEANING CO., INC. ("CUNNINGHAM"), by its attorneys, RUSSO, KEANE & TONER, LLP, as and for its Response to the allegations set forth in the Complaint by Adoption (Check-Off-Complaint) Related to the Master Complaint filed in the above referenced action, hereby adopt their Answer to Master Complaint dated, August 1, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant, CUNNINGHAM demands judgment dismissing the above captioned caption action as against it, together with its costs and disbursements and for such other

and further relief as this Court deems just and proper.

Dated: New York, New York
January 30, 2008

Kevin G. Horbatiuk

Kevin G. Horbatiuk (KGH4977)

Attorneys for Defendant

**CUNNINGHAM DUCT WORK s/h/i/a
CUNNINGHAM DUCT CLEANING CO.,
INC.**

RUSO, KEANE & TONER, LLP

26 Broadway, 28th Floor

New York, New York 10004

(212) 482-0001

RKT File No. 824.078

TO: CHRISTOPHER R. LaPOLA, ESQ.,
WORBY GRONER EDELMAN & NAPOLI BERN, LLP
Attorney for Plaintiff
GLADYS AGUDELO
115 Broadway 12th Floor
New York, New York 10006
(212) 267-3700

CERTIFICATION OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon the following listed person by placing a copy of the same in the United States mail, postage prepared and properly addressed, this the 30th day of January, 2008.

CHRISTOPHER R. LaPOLA, ESQ.,
WORBY GRONER EDELMAN & NAPOLI BERN, LLP
Attorney for Plaintiff
GLADYS AGUDELO
115 Broadway 12th Floor
New York, New York 10006


KEVIN G. HORBATIUK